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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

CHRISTOPHER J. HADNAGY, an individual;  
and SOCIAL-ENGINEER, LLC, a  
Pennsylvania limited liability company,

Plaintiffs,

v.

JEFF MOSS, an individual; DEF CON  
COMMUNICATIONS, INC., a Washington  
corporation; and DOES 1-10; and ROE  
ENTITIES 1-10, inclusive,

Defendants.

Case No.: 2:23-cv-01345-CDS-BNW

**JOINT STATUS REPORT**

Pursuant to the Court’s August 31, 2023 Minute Order (ECF No. 5), Defendants Jeff Moss and DEF CON Communications, Inc. (collectively, “Defendants”), and Plaintiffs Christopher Hadnagy and Social-Engineer, LLC (collectively, “Plaintiffs”), hereby submit this Joint Status Report:

1                   **1. Status of the Action:**

2                   On August 9, 2023, Plaintiffs filed their Complaint against Defendants with the Eighth  
3 Judicial District Court, Clark County, Nevada (Case No. A-23-875618-C). *See* ECF No. 1-1, at 2.  
4 On August 10, 2023, Defendants were served with the Complaint and Summons. *See* ECF No. 11-  
5 1, at 2-3.

6                   On August 29, 2023, Defendants filed a Notice of Removal pursuant to 28 U.S.C. §§ 1332,  
7 1441, and 1446, alleging that there is complete diversity between the parties, and that the amount  
8 in controversy exceeds \$75,000.00. *See* ECF No. 1. That same day, Defendants filed their  
9 Certificate of Interested Parties. *See* ECF No. 2. Defendants also filed two verified petitions for  
10 permission to practice *pro hac vice* for Defendants' counsel, which this Court granted. *See*  
11 ECF Nos. 3-4, 7-8.

12                  Pursuant to the parties' September 1, 2023, stipulation and order, Plaintiffs granted  
13 Defendants a 30-day extension to respond to the Complaint. Accordingly, Defendants' deadline to  
14 file a response to the Complaint is October 2, 2023. *See* ECF No. 6. Defendants intend to file a  
15 Motion to Dismiss. Accordingly, Plaintiffs' response would therefore be due on October 16, 2023,  
16 and Defendants' reply would therefore be due on October 23, 2023. LR 7-2.

17                  Defendants also intend to file a Motion to Transfer Venue to the Western District of  
18 Washington pursuant to 28 U.S.C. § 1404 approximately one week after filing their Motion to  
19 Dismiss. Defendants asked Plaintiff to stipulate to consolidate the briefing on both the Motion to  
20 Dismiss and Motion to Transfer, which included a request for an additional extension to file a  
21 response to the Complaint, as well as an extended briefing schedule. Plaintiff refused said request  
22 to avoid further delay.

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1                   **2. Action to be Taken by the Court:**

2                   The parties submit that until briefing is complete on the Motion to Dismiss and the Motion  
3 to Transfer, no further action is required of this Court.

4                   DATED this 29th day of September 2023.

                  DATED this 29th day of September 2023.

5                   **RIKLIS LAW, PLLC**

**HOLLAND & HART LLP**

6  
7                   /s/ Kristofer Z. Riklis

/s/ Robert J. Cassity

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 29th day of September, 2023, a true and correct copy of the foregoing **JOINT STATUS REPORT** was served by the following method(s):

☒ Electronic: by submitting electronically for filing and/or service with the United States District Court, District of Nevada's e-filing system and served on counsel electronically in accordance with the E-service list to the following email addresses:

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